

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTORS INC., TEAM AUTO SALES LLC, ROBERT ANTHONY URRUTIA, 189 SUNRISE HWY AUTO LLC, NORTHSHORE MOTOR LEASING, LLC, BRIAN CHABRIER, individually and derivatively as a member of NORTHSHORE MOTOR LEASING, LLC, JOSHUA AARONSON, individually and derivatively as a member of 189 SUNRISE HWY AUTO, LLC, JORY BARON, 1581 HYLAN BLVD AUTO LLC, 1580 HYLAN BLVD AUTO LLC, 1591 HYLAN BLVD AUTO LLC, 1632 HYLAN BLVD AUTO LLC, 1239 HYLAN BLVD AUTO LLC, 2519 HYLAN BLVD AUTO LLC, 76 FISK STREET REALTY LLC, 446 ROUTE 23 AUTO LLC and ISLAND AUTO MANAGEMENT, LLC,

Case No.: 2:23-cv-6188 (JMW)

DECLARATION OF JAMIE S.
FELSEN, ESQ.

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY THOMASSON, DWIGHT BLANKENSHIP, MARC MERCKLING, MICHAEL LAURIE, THOMAS JONES, CPA, CAR BUYERS NYC INC., GOLD COAST CARS OF SYOSSET LLC, GOLD COAST CARS OF SUNRISE LLC, GOLD COAST MOTORS AUTOMOTIVE GROUP LLC, GOLD COAST MOTORS OF LIC LLC, GOLD COAST MOTORS OF ROSLYN LLC, GOLD COAST MOTORS OF SMITHTOWN LLC, UEA PREMIER MOTORS CORP., DLA CAPITAL PARTNERS INC., JONES, LITTLE & CO., CPA'S LLP, FLUSHING BANK, and LIBERTAS FUNDING LLC,

Defendants.

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JAMIE S. FELSEN, ESQ., pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.10 of the United States District Court for the Eastern District of New York, declares as follows:

1. Your deponent is an attorney and counselor at law duly admitted to practice before the courts of the State of New York and before this Honorable Court. Further, your deponent is a member of Milman Labuda Law Group, PLLC (“MLLG”). In that capacity, your deponent is fully and personally familiar with all the facts and circumstances set forth herein except for those items stated to be alleged upon information and belief.

2. This declaration is respectfully submitted in support of MLLG’s Motion to Withdraw as Counsel to Plaintiffs SUPERB MOTORS INC., TEAM AUTO SALES LLC, ROBERT ANTHONY URRUTIA (the “Superb Plaintiffs”).

3. Since the commencement of this action, I, along with Emanuel Kataev, have represented the Superb Plaintiffs.

4. In January 2024, Mr. Kataev’s employment with MLLG ended at which time he formed Sage Legal LLC. Mr. Kataev has continued to represent the Superb Plaintiffs through Sage Legal LLC.

5. Unfortunately, due to the acts of Defendants, as alleged in the pleadings, Mr. Urrutia has been forced to close Superb Motors Inc., Team Auto Sales LLC, and his other dealerships, thereby placing Mr. Urrutia in a precarious financial condition.

6. Based on his financial condition, Mr. Urrutia has been unable to pay MLLG’s outstanding invoices and has indicated that he is unable to pay to utilize MLLG’s legal services going forward as MLLG is unable to enter into a contingency fee arrangement.

7. Therefore, MLLG seeks leave to withdraw as counsel to the Superb Plaintiffs. Sage Legal LLC will continue to represent the Superb Plaintiffs.

Dated: March 25, 2025

Lake Success, New York

/s/ Jamie S. Felsen, Esq.